

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

UNITED STATES OF AMERICA,)
Plaintiff,)
vs.) No. 08-CR-50013
ROBERT S. JOHNSON,)
Defendant.)

**PETITION TO EXTEND BOND CONDITIONS TO PERMIT
TRAVEL WITH THE STATE OF TEXAS**

NOW COMES the defendant, ROBERT S. JOHNSON, by his attorneys, SREENAN & CAIN, P.C., RANDY WILT, and moves this Court to expand the conditions of his bond to permit him to travel to the Southern and Eastern Division of Texas. In support hereof, it is stated as follows:

1. Defendant is pending in the Northern District of Illinois on charges involving Lacey Act violations. 16 USC § 3372 and 3373.
2. That at the time of arraignment on March 25, 2008, Defendant was given permission to reside in San Marcos, Texas, conditioned upon his being monitored by a pretrial officer in the Western Division of Texas.
3. Defendant has been advised that absent an Order of this Court, he will not be permitted to travel outside the Western Division.
4. Defendant's wife, Connie Johnson, from whom he is separated but still friendly and with whom he still has contact over family matters, lives in Laguna Vista, Texas. His accountant, who is preparing tax returns for Defendant and his wife, is located in Port Isabel, Texas. Both locations are within the South District of Texas.
5. Defendant's daughter is a student at Texas A & M University in College Station, Texas, located in the Eastern Division of Texas.
6. Defendant needs permission to periodically travel to the Southern District and Eastern District of Texas to tend to business and family matters.

WHEREFORE, the defendant, ROBERT S. JOHNSON, prays this Court modify his bond to permit him to travel to the Southern and Eastern Districts of Texas.

ROBERT S. JOHNSON, Defendant,

By: *s/*
RANDY WILT, Attorney at Law

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